

**LABATON KELLER
SUCHAROW LLP**

Lauren A. Ormsbee (*pro hac vice*)
Lisa M. Strejlau (*pro hac vice*)
Charles J. Stiene (*pro hac vice*)
140 Broadway
New York, New York 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477
lormsbee@labaton.com
lstrejlau@labaton.com
cstiene@labaton.com

*Lead Counsel for Lead Plaintiff
Arkansas Teacher Retirement System
and for the Proposed Class*

**GLANCY PRONGAY &
MURRAY LLP**

Robert V. Prongay (SBN 270796)
Charles H. Linehan (SBN 307439)
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Facsimile: (310) 432-1495
rprongay@glancylaw.com
clinehan@glancylaw.com

*Liaison Counsel for Lead Plaintiff
and for the Proposed Class*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LESLIE LILIEN, Individually and on
Behalf of All Others Similarly
Situating,

Plaintiff,

v.

OLAPLEX HOLDINGS, INC., et al.,

Defendants.

Case No. 2:22-CV-08395-SVW-SK

**SUPPLEMENTAL DECLARATION
OF LAUREN A. ORMSBEE IN
SUPPORT OF LEAD PLAINTIFF'S
MOTION FOR CLASS
CERTIFICATION**

Date: July 21, 2025
Time: 1:30 p.m.
Courtroom: 10A
Judge: Hon. Stephen V. Wilson

1 1. I, Lauren A. Ormsbee, am a partner at the law firm Labaton Keller
2 Sucharow LLP, Lead Counsel for Court-appointed Lead Plaintiff Arkansas Teacher
3 Retirement System (“ATRS” or “Lead Plaintiff”) and for the proposed Class. I am a
4 member in good standing of the Bar of the State of New York, and I am admitted to
5 practice *pro hac vice* before this Court.

6 2. I respectfully submit this Supplemental Declaration, together with the
7 attached exhibits, in further support of Lead Plaintiff’s Motion for Class
8 Certification.

9 3. Attached as **Exhibit D** is a true and correct copy of the Expert Reply
10 Report of Professor Joshua Mitts, Ph.D. Because this document cites to documents
11 and deposition testimony that have been designated “Confidential” by Defendants
12 and non-party The Depository Trust & Clearing Corporation (“DTCC”), and for the
13 reasons set forth in Lead Plaintiff’s Application For Leave to File Documents Under
14 Seal (the “Motion to Seal”), this exhibit is filed with redactions in the publicly-filed
15 version of this declaration.

16 4. Attached as **Exhibit E** is a true and correct copy of excerpts from the
17 transcript of the June 9, 2025 Rule 30(b)(6) deposition of Lead Plaintiff ATRS, by
18 and through its corporate designee Mark White.

19 4. Attached as **Exhibit F** is a true and correct copy of a document entitled
20 “Olaplex – Shareholder Overview” bearing Bates stamp OLPX-SA-0000128751.
21 Because this document has been designated “Confidential” by Defendants, and for
22 the reasons set forth in the Motion to Seal, this exhibit is filed under seal and
23 withheld from the publicly-filed version of this declaration.

24 5. Attached as **Exhibit G** is a true and correct copy of excerpts from the
25 transcript of the June 17, 2025 30(b)(6) deposition of T. Rowe Price, by and through
26 its corporate designee Christina Brathwaite.

1 6. Attached as **Exhibit H** is a true and correct copy of a July 14, 2021
2 email bearing Bates stamp OLPX-SA-0000023829. Because this document has been
3 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
4 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
5 of this declaration.

6 7. Attached as **Exhibit I** is a true and correct copy of a May 18, 2021
7 email bearing Bates stamp OLPX-SA-0000023940. Because this document has been
8 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
9 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
10 of this declaration.

11 8. Attached as **Exhibit J** is a true and correct copy of a June 10, 2021
12 email bearing Bates stamp OLPX-SA-0000022649. Because this document has been
13 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
14 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
15 of this declaration.

16 9. Attached as **Exhibit K** is a true and correct copy of a July 20, 2021
17 email bearing Bates stamp OLPX-SA-0000023677. Because this document has been
18 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
19 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
20 of this declaration.

21 10. Attached as **Exhibit L** is a true and correct copy of a June 17, 2021
22 email bearing Bates stamp OLPX-SA-0000022725. Because this document has been
23 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
24 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
25 of this declaration.

26 11. Attached as **Exhibit M** is a true and correct copy of an April 13, 2022
27 email bearing Bates stamp OLPX-SA-0000062140. Because this document has been
28

1 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
2 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
3 of this declaration.

4 12. Attached as **Exhibit N** is a true and correct copy of a March 3, 2022
5 email bearing Bates stamp OLXP-SA-0000079248. Because this document has been
6 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
7 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
8 of this declaration.

9 13. Attached as **Exhibit O** is a true and correct copy of a March 3, 2022
10 email bearing Bates stamp OLPX-SA-0000275120. Because this document has been
11 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
12 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
13 of this declaration.

14 14. Attached as **Exhibit P** is a true and correct copy of a March 3, 2022
15 email bearing Bates stamp OLPX-SA-0000054037. Because this document has been
16 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
17 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
18 of this declaration.

19 15. Attached as **Exhibit Q** is a true and correct copy of an April 1, 2022
20 PowerPoint presentation produced in native format but bearing Bates stamp OLPX-
21 SA-0000154887. Because this document has been designated “Confidential” by
22 Defendants, and for the reasons set forth in the Motion to Seal, this exhibit is filed
23 under seal and withheld from the publicly-filed version of this declaration.

24 16. Attached as **Exhibit R** is a true and correct copy of an April 1, 2022
25 PowerPoint presentation bearing Bates stamp OLPX-SA-0000053055. Because this
26 document has been designated “Highly Confidential” by Defendants, and for the
27
28

1 reasons set forth in the Motion to Seal, this exhibit is filed under seal and withheld
2 from the publicly-filed version of this declaration.

3 17. Attached as **Exhibit S** is a true and correct copy of an April 13, 2022
4 email bearing Bates stamp OLPX-SA-0000062140. Because this document has been
5 designated “Confidential” by Defendants, and for the reasons set forth in the Motion
6 to Seal, this exhibit is filed under seal and withheld from the publicly-filed version
7 of this declaration.

8 18. Attached as **Exhibit T** is a true and correct copy of the Reply in Further
9 Support of Lead Plaintiffs’ Motion for Class Certification filed in *In re Snap Inc.*
10 *Sec. Litig.*, No. 2:17-cv-03679-SVW-AGR (ECF No. 304) dated July 26, 2019.

11 19. Attached as **Exhibit U** is a true and correct copy of excerpts from the
12 transcript of the June 25, 2025 Rule 30(b)(1) deposition of Jack R. Wiener. Because
13 this transcript has been designated “Confidential” by Defendants, and for the reasons
14 set forth in the Motion to Seal, this exhibit is filed under seal and withheld from the
15 publicly-filed version of this declaration.

16 20. Attached as **Exhibit V** is a true and correct copy of Exhibits 3, 4, and 5
17 from the June 25, 2025 Rule 30(b)(1) deposition of Jack R. Wiener. Because this
18 transcript and these documents have been designated “Confidential” by Defendants,
19 and for the reasons set forth in the Motion to Seal, this exhibit is filed under seal and
20 withheld from the publicly-filed version of this declaration.

21 I declare under penalty of perjury, under the laws of the United States of
22 America that the foregoing is true and correct this 27th day of June, 2025.

23
24 /s/ Lauren A. Ormsbee

25 Lauren A. Ormsbee
26
27
28